

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NO. 21 MC 101 (AKH)

IN RE SEPTEMBER 11 LITIGATION

This document related to  
*Bavis v. United Airlines, Inc., et al.*  
02 Civ. 7154 (AKH)

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**MOTION TO ADMIT COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jonathan Ross, a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: Edwin W. Green  
Firm Name: ED GREEN ATTORNEY AT LAW  
Address: P.O. Box 74  
0266 Gold Nugget Drive  
Breckenridge Colorado 80424  
Phone Number: (212) 661-4200 and 1-888-406-0806  
Fax Number: (212) 661-4813  
Email Address: [ed.green@la-taupe.net](mailto:ed.green@la-taupe.net)

Edwin W. Green is a member in good standing of the Bar of the State of California, the United States District Court for the Northern District of California, the United States District Court for the Central District of California, the United States District Court for the Eastern District of

JAN 25 2011

925-927690

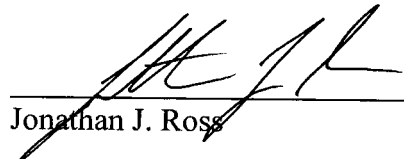
FILED  
U.S. DISTRICT COURT  
2011 JAN 25 AM 11:03  
S.D. OF N.Y.

**CERTIFICATE OF SERVICE**

I, Jonathan J. Ross, an attorney with the firm of Susman Godfrey L.L.P., attorneys for Defendant Huntleigh USA Corporation, certify:

I am over eighteen (18) years of age. On this 24th day of January, 2011, I caused to be served by email the MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIDAVIT IN SUPPORT OF MOTION TO ADMIT ATTORNEY PRO HAC VICE, AND PROPOSED ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION on the parties on the following service list:

1. Donald A. Migliori, Esq., Joseph F. Rice, Esq. and Mary F. Schiavo, Esq. – *Wrongful Death and Personal Injury Plaintiffs' Liaison Counsel and Plaintiff's Counsel*;
2. Desmond T. Barry, Esq. and Victoria Turchetti, Esq. – *Aviation Defendants Liaison Counsel*;
3. Robert A. Clifford, Esq. and Timothy T. Tomasik, Esq. – *Property Damage and Business Loss Plaintiffs' Liaison Counsel*;
4. Beth Jacob, Esq. – *WTC 7 Ground Defendants' Liaison Counsel*;
5. Richard Williamson, Esq. and Jason T. Cohen, Esq. – *WTCP Counsel*;
6. Katherine L. Pringle, Esq. – *WTC 7 Ground Defendants' Liaison Counsel*; and
7. Jeannette Vargas, Esq. and Alicia M. Simmons, Esq. – *United States Attorneys' Office*.

  
Jonathan J. Ross

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**AFFIDAVIT IN SUPPORT OF MOTION  
TO ADMIT ATTORNEY PRO HAC VICE**

State of New York :  
: ss.  
County of New York :

JONATHAN ROSS, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Susman Godfrey, L.L.P. and am counsel for Defendant Huntleigh USA Corporation in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Huntleigh USA Corporation's motion to admit Edwin W. Green as counsel *pro hac vice* to represent Defendant Huntleigh USA Corporation in this matter.

2. I am a member in good standing of the bars of the States of New York and Texas, and was admitted to practice law in 1993 and 1994, respectively. I am also admitted to, and am in good standing in the United States District Court for the Southern District of Texas (3/24/95), the Northern District of Texas (9/19/03), the Eastern District of Texas, the Eastern District of Arkansas (08/11/04), the Western District of Arkansas (08/11/04), the Northern District of

Georgia (2004), the Eastern District of NY (2/8/07), the Southern District of NY (2/6/07), the United States Court of Appeals for the Federal Circuit (12/01/99), the United States Court of Appeals for the Second Circuit (02/05/02), the US Court of Appeals for 5th Circuit (2/23/05), and the United States Supreme Court (10/6/03).

3. I have known Edwin W. Green since about March 2008.

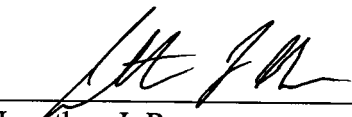
4. Mr. Green is a solo practitioner and a litigation management consultant admitted to practice law in the State of California. I attach an Affirmation from Mr. Green in Support of the Notice of Motion to Admit Counsel *Pro Hac Vice* as Exhibit 1.

5. I have found Mr. Green to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

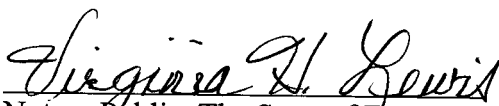
6. Accordingly, I am pleased to move for the admission of Edwin Green, *pro hac vice*. I attach Certificates of Good Standing from the State Bar of California and from the United States District Courts for the Northern, Central and Eastern Districts of California, as Exhibit 2.

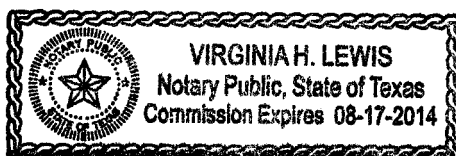
7. I respectfully submit a proposed order granting the admission of Edwin Green, *pro hac vice*, which is attached hereto as Exhibit 3.

WHEREFORE, it is respectfully requested that the motion to admit Edwin Green, *pro hac vice*, to represent Defendant Huntleigh USA Corporation in the captioned matter, be granted.

  
Jonathan J. Ross

Sworn to before me this  
24th day of January 2011

  
Notary Public, The State of Texas



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION  
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MARY BAVIS,

Plaintiff,

-against-

UAL CORPORATION et al.,

Defendants.  
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AFFIRMATION OF  
EDWIN GREEN

21 MC 101 (AKH)

02 Civ. 7154

EDWIN W. GREEN solemnly affirms and says:

1. I am a solo practitioner of the firm Ed Green Attorney at Law. My business address is P.O. Box 74, 0266 Gold Nugget Drive, Breckenridge, Colorado 80424. My business telephone numbers are (212) 661-4200 and 1-888-406-0806.

2. I was admitted to practice law in the State of California on June 14, 1960. I am also admitted to practice law in the District Courts for the Central, Northern and Eastern Districts of California. I am admitted to practice law in the Ninth Circuit Court of Appeals and the Supreme Court of the United States.

3. I am, and always have been, a member in good standing of all Courts to which I have been admitted.

4. A recent Certificate of Good Standing from the State of California and Certificates of Good Standing from the federal courts to which I am admitted are attached as Exhibit 2 to the Affidavit of Jonathan Ross, Esq.

5. I have become familiar with the standards of professional conduct imposed upon members of the New York Bar and the Bar of the Southern District of New York and relevant statutes, rules, and procedures, and I will abide by them.

6. Having spoken with my client on this matter, I represent to the Court that my client has full confidence in my legal abilities and wishes for me to participate as its counsel in this proceeding.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 10, 2011  
New York, New York

A handwritten signature in black ink, appearing to read 'Edwin W. Green', is written over a horizontal line.

EDWIN W. GREEN, ESQ.



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

January 10, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, EDWIN W. GREEN #30508 was admitted to the practice of law in this state by the Supreme Court of California on June 14, 1960; that from the date of admission to December 31, 2009, he was an ACTIVE member of the State Bar of California; that on December 31, 2009, he transferred at his request to the INACTIVE status; that from that date to March 15, 2010, he was an INACTIVE member of the State Bar of California; that on March 15, 2010, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records

## *Certificate of Good Standing*

*United States of District Court* )

) ss.

*Northern District of California* )

*I, Richard W. Wicking, Clerk of the United States District Court for the Northern District of California, do hereby certify that Edwin W. Green, Bar No. 30508 was duly admitted to practice in said Court on December 28, 1964, and is in good standing as a member of the bar of said Court.*

*Dated at San Francisco on January 12, 2011*

*Richard W. Wicking*  
*Clerk*

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# United States District Court

Central District of California

## CERTIFICATE OF GOOD STANDING

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I, TERRY NAFISI, Clerk of this Court, certify that

Edwin W, Green Bar Number 30508

duly admitted to practice in this Court on June 14, 1970

and is in good standing as a member of the Bar of this Court.

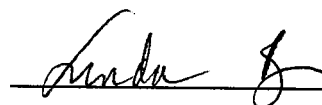
Dated at Los Angeles, California

on January 12, 2011  
*DATE*

TERRY NAFISI

District Court Executive, Clerk of Court

By



Linda Rayford, Deputy Clerk



AO 136 (Rev. 9/98) Certificate of Good Standing

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

**CERTIFICATE OF  
GOOD STANDING**

*I, Victoria C. Minor, Clerk of this Court,  
certify that **Edwin W. Green**, Bar # **30508**,  
was duly admitted to practice in this Court on  
**06/07/1990**, and is in good standing  
as a member of the Bar of this Court.*

*Dated at 1/19/2011.*

*Victoria C. Minor*

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*Victoria C. Minor, Clerk of Court*

United States District/Magistrate Judge